

ORIGINAL

AUSA: GEORGIA V. KOSTOPOULOS

**24 MAG 3977**

**COMPLAINT**

UNITED STATES OF AMERICA

v.

MAXWELL PAUL,

Defendant.

Violations of

21 U.S.C. §§ 812 and 841; 18 U.S.C. § 2

COUNTY OF OFFENSE:

BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

SAMUEL LOUIS, JR., being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration ("DEA"), and charges as follows:

**COUNT ONE**

**(Distribution of Narcotics)**

1. On or about November 13, 2024, in the Southern District of New York and elsewhere, MAXWELL PAUL, the defendant, knowingly and intentionally distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and aided and abetted the same.

2. The controlled substance involved in the offense was 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 812 and 841; Title 18, United States Code, Section 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

3. I am a Special Agent with the DEA, and have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with other law enforcement officers and other individuals. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

4. Earlier this month, a confidential source working at the direction of the DEA (the "CS")<sup>1</sup> indicated that the CS would be able to acquire fentanyl from an individual in New York

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<sup>1</sup> The CS was previously convicted of narcotics offenses and a charge related to the sale of a stolen vehicle. The CS has pleaded guilty, pursuant to a cooperation agreement, to a federal criminal information charging him with participating in a narcotics conspiracy, possession of a firearm in relation to a drug trafficking crime, possession of a firearm as a felon, conspiracy to commit wire



City. That same day, law enforcement officers observed an individual later identified as MAXWELL PAUL, the defendant, provide items to the CS that included substances that tested positive for fentanyl.

5. Based on my participation in this investigation, including my conversations with other members of law enforcement and other individuals, my review of reports and records, and my review of photographs, videos, and physical surveillance, I have learned the following, in substance and in part:

a. On or about November 13, 2024, the CS contacted by phone MAXWELL PAUL, the defendant, who referred to himself as "Luis." During several recorded conversations between PAUL and the CS, PAUL, in sum and substance, agreed to sell the CS approximately 25,000 fentanyl pills for \$137,500, and agreed to meet the CS in the vicinity of a shopping center in the Bronx, New York, later that afternoon. PAUL also told the CS that he could sell the CS an additional 100,000 pills in approximately five days.

b. Law enforcement officers subsequently began conducting surveillance in the vicinity of a commercial shopping center located on Bartow Avenue in the Bronx, during which law enforcement officers observed PAUL arrive in a particular vehicle, which parked in the parking lot of the commercial shopping center. Law enforcement officers observed PAUL exit his vehicle and enter the rear passenger side of CS's vehicle, which had arrived earlier that afternoon and was parked in the same parking lot.

c. Based on my discussions with the CS, my review of a recording of the meeting, and my discussions with law enforcement officers who were surveilling the meeting, I know that PAUL showed the CS a small plastic bag containing small blue pills and allowed the CS to inspect the pills. During that initial meeting, PAUL and the CS discussed the color of the pills and their strength, and the CS confirmed that he intended to sell the pills at a concert in another country. After the CS confirmed that he would accept the pills, PAUL exited the CS's vehicle, returned to his vehicle, removed a green cooler from the trunk of his vehicle, and returned to the CS's vehicle. Based on my discussions with the CS, I know that, once inside, PAUL provided the CS with the green cooler and showed him its contents, inside of which were several additional large clear bags containing small blue pills. In total, and as depicted in the below image, the clear packages appear to contain approximately 25,000 pills. After PAUL handed the CS the green cooler, law enforcement officers approached PAUL while he was still seated in the CS's vehicle and arrested him. A photograph of those pills is depicted below.

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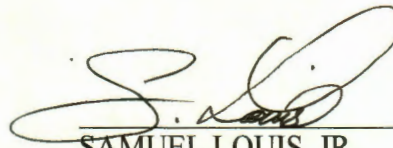
fraud, and the sale and possession of stolen property. The CS previously served as a confidential source for law enforcement and engaged in criminal activity with others while serving as a confidential source. Information provided by the CS has been found reliable and corroborated by, among other things, phone records and physical surveillance, and has led to multiple seizures of narcotics.



d. Based on my review of law enforcement reports and my discussions with other law enforcement officers, I know that randomly selected pills from each of the packages that PAUL sold to the CS subsequently field-tested positive for the presence of fentanyl, and weighed approximately 2.6 kilograms in total.



WHEREFORE, I respectfully request that MAXWELL PAUL, the defendant, be imprisoned or bailed, as the case may be.



SAMUEL LOUIS, JR.  
Special Agent  
Drug Enforcement Administration

Sworn to before me ~~by reliable electronic means~~  
(~~telephone~~) this 14<sup>th</sup> day of November, 2024

*in person/oval*



THE HONORABLE ONA T. WANG  
United States Magistrate Judge  
Southern District of New York